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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91205046
Party	Plaintiff Christina Sukljian
Correspondence Address	CHRISTINA SUKLJIAN 13 MANOR STREET ALBANY, NY 12207 UNITED STATES info@zela.com
Submission	Motion to Compel Discovery
Filer's Name	Nicole E. Kaplan
Filer's e-mail	nkaplan@pryorcashman.com
Signature	/Nicole E. Kaplan/
Date	01/11/2013
Attachments	16419-00004(2013-01-11 16-44-04).PDF ( 43 pages )(1364891 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Application No. 85215017  
for the mark HAUS OF GAGA

----- X		
CHRISTINA SUKLJIAN,	:	
	:	
Opposer,	:	Opposition No. 91205046
	:	
v.	:	
	:	
ATE MY HEART, INC.,	:	
	:	
Applicant.	:	
ATE MY HEART, INC.,	:	
	:	
Petitioner,	:	Cancellation No. 92055279
	:	
v.	:	
	:	
CHRISTINA SUKLJIAN,	:	
	:	
Respondent.	:	
----- X		

**MOTION TO COMPEL OPPOSER TO: (A) PROVIDE ANSWERS  
TO APPLICANT'S FIRST SET OF INTERROGATORIES AND  
(B) PRODUCE DOCUMENTS IN RESPONSE TO  
APPLICANT'S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS**

Applicant Ate My Heart Inc. ("AMH"), in accordance with Rule 523 of the Trademark Trial and Appeal Board Manual of Procedure ("TBMP"), 37 CFR §2.120(e), submits this motion for an order compelling Opposer Christina Sukljian ("Sukljian") to:

1. Provide verified answers to AMH's First Set of Interrogatories to Opposer, which were served on November 7, 2012 by first class mail ("Interrogatories"), a copy of which is

annexed hereto as Exhibit A; and

2. Produce documents in response to AMH's First Request for the Production of Documents to Opposer, which were served on November 7, 2012 by first class mail ("Document Requests"), a copy of which is annexed hereto as Exhibit B. (The aforementioned Interrogatories and Document Requests are collectively referred to herein as the "Discovery Requests.").

### **PRELIMINARY STATEMENT**

Opposer has failed to produce any responses to Applicant's Discovery Requests. This is not the first time that Opposer has evaded her responsibility to provide meaningful discovery. In fact, in the cancellation action, which is now consolidated herein, Opposer ignored Applicant's Discovery Requests as well as multiple emails, letter correspondence and phone messages reminding Opposer to respond. AMH was left with no other option but to move to compel Opposer's responses to the Discovery Requests. The Board granted AMH's motion to compel by an Order dated November 6, 2012. In blatant disregard of the Board's Order, Opposer still has not provided any substantive responses or documents to AMH, forcing AMH to move for sanctions.

Opposer once again is shirking her obligations under the TBMP and the Federal Rules of Civil Procedure by failing to respond to AMH's Discovery Requests served in connection with the opposition. Given the recent actions by Opposer, AMH is not optimistic that Opposer will cooperate in discovery and provide appropriate responses and documents to AMH. Thus, in accordance with TBMP §523.02 and 37 CFR §2.120(e), AMH respectfully requests that its Motion to Compel be granted in its entirety.

## **STATEMENT OF FACTS**

### **AMH and its Trademarks**

AMH is a corporation owned by the internationally renown musical star Stefani Germanotta p/k/a Lady Gaga. Lady Gaga has sold more than twenty-three (23) million albums and sixty-four (64) million singles worldwide. Both *Time Magazine* and *Forbes* included Lady Gaga in their respective annual list of the most influential people in the world (*Time*) and the most powerful and influential celebrities in the world (*Forbes*), respectively. *Forbes* also placed her at number seven on its annual list of the World's 100 Most Powerful Women. Lady Gaga has consecutively appeared on *Billboard* magazine's Artists of the Year (scoring the definitive title in 2010) and ranked fourth in VH1's list of 100 Greatest Women in Music.

On August 24, 2010, AMH filed an application to register the mark HAUS OF GAGA in cl. 3 (Ser. No 85/215,017 with a claim of foreign priority of July 13, 2010, pursuant to CTM Ser. No. 009244625). On May 1, 2012, Opposer filed the instant opposition against Applicant's application on the grounds that Applicant's Mark, HAUS OF GAGA, is likely to be confused with Opposer's GAGA PURE PLATINUM registration.

### **Opposer's Non-Use and Abandonment of Opposer's Mark**

On August 27, 2001, Opposer filed an application to register the mark GAGA PURE PLATINUM covering various items in cl.3 which proceeded to registration on November 2, 2004 ("Opposer's Mark"). After a good faith investigation, on March 5, 2012, Applicant sought to cancel Opposer's Mark on the ground that Opposer was not using Opposer's Mark in commerce in connection with the goods covered in her registration, namely, "cosmetics; namely, nail polish, lipstick, lip-gloss, eye-liner, lip-liner, eye shadow, face powder, blush, mascara" in cl.

3 (“Cancellation Action”). Upon information and belief, at the time Applicant filed the Cancellation Action, Opposer had not had valid trademark use of Opposer’s Mark on those items for at least several years, if ever.

Opposer’s is now using Opposer’s Mark -- a mark that upon information and belief Opposer ceased using and did not resume until long after Lady Gaga burst onto the music and fashion scene – to oppose AMH’s HAUS OF GAGA application in cl. 3.

### **Opposer’s Refusal To Provide Discovery**

#### **1. Opposer Has Not Cooperated In Discovery In The Cancellation Action**

On June 29, 2012, AMH served its Interrogatories and Document Requests upon Opposer in the Cancellation Action. Accordingly, Opposer’s responses were due by August 3, 2012. No response whatsoever was received. Opposer was reminded on multiple occasions of her obligation under the TTAB and Federal Rules to respond to AMH’s Discovery Requests, but continued to evade discovery. Because Opposer gave no assurance whatsoever that she would ever respond to the Discovery Requests, AMH moved to compel her responses.

The Board granted AMH’s Motion to Compel on November 6, 2012 and directed Opposer to respond to AMH’s Discovery Requests or face sanctions. On November 26, 2012, Opposer served its “responses.” In blatant disregard of the Board’s Order, these responses provided no information whatsoever. Opposer responded to all but two of AMH’s twenty-one Interrogatories with the language “Claim of privilege by Defendant.” Opposer responded with this same perfunctory language *to all but one* of AMH’s *seventy* document requests<sup>1</sup>, without producing a single document or providing any information which would “permit AMH to evaluate the claim of privilege,” as Opposer was instructed to do by the Discovery Requests.

Accordingly, AMH filed a Motion for Sanctions on December 20, 2012.

## **2. Opposer Is Not Cooperating In Discovery In The Opposition**

Opposer was served with the AMH's Discovery Requests in this matter on November 7, 2012. Opposer served the exact same meaningless responses claiming "privilege" as she did in the Cancellation Action. See Exhibit C. No actual documents whatsoever were produced.

### **ARGUMENT**

According to Federal Rule of Evidence 502, the two privileges relevant to discovery issues are attorney-client privilege and work product protection. These two privileges are defined in FRE 502(g) as:

- (1) "attorney-client privilege" means the protection that applicable law provides for confidential attorney-client communications; and
- (2) "work-product protection" means the protection that applicable law provides for tangible material (or its intangible equivalent) prepared in anticipation of litigation or for trial.

The information and documents requested by AMH do not fall under either of these privileges. As set forth in AMH's Discovery Requests attached hereto as Exhibits A and B, AMH requested that Opposer produce information and documents to prove that Opposer has actually been using Opposer's Mark on each of the items identified in its registration since the date of first use claimed in Opposer's registration. The items responsive to AMH's Discovery Requests include but are not limited to invoices, the quantity of items sold under the mark each year, annual revenues received from items sold under the mark, advertising examples, annual advertising expenditures, customer lists, contracts or licenses relating to the use of the mark and packaging for the goods. None of these items were provided and none are on the website

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<sup>1</sup> The one document request directed AMH to website.

identified by Opposer.

Opposer is relying on Opposer's Mark to oppose AMH's trademark application. Opposer's responses to AMH's Interrogatories and Document Requests are essential to determining whether Opposer has actually been using its Mark in commerce without abandonment since the date it averred in Opposer's Registration. Opposer should be compelled to provide AMH with verified responses to its Interrogatories - without objections on the merits - and responses to its Document Requests.

\* \* \* \* \*

WHEREFORE, for the reasons set forth herein, AMH's motion to compel should be granted in its entirety and Opposer should be compelled to: (a) provide verified answers to AMH's Interrogatories; and (b) produce documents in response to AMH's Document Requests.

In light of the fact that Opposer has completely stymied AMH's efforts to obtain discovery in this matter, we ask that the Board *suspend* this proceeding pending resolution of this motion to compel.

Dated: New York, New York  
January 10, 2013

Respectfully submitted,  
PRYOR CASHMAN LLP

By: 

Lisa M. Buckley  
Nicole E. Kaplan  
Attorneys for Applicant AMH  
7 Times Square  
New York, New York 10036  
(212) 421-4100

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing:

MOTION TO COMPEL OPPOSER TO: (A) PROVIDE ANSWERS  
TO APPLICANT'S FIRST SET OF INTERROGATORIES; AND  
(B) PRODUCE DOCUMENTS IN RESPONSE TO  
APPLICANT'S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS

is being mailed by first class mail, postage prepaid to Opposer at the following address:

Christina Sukljian  
13 Manor Street  
Albany, NY 12207

Dated: New York, New York  
January 10, 2013

  
Janice Romeo Keller



# **EXHIBIT A**

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Application No. 85215017  
for the mark HAUS OF GAGA

-----X	
CHRISTINA SUKLJIAN,	:
	:
Opposer,	:
	:
v.	:
	:
ATE MY HEART, INC.,	:
	:
Applicant.	:
-----X	

Opposition No. 91205046

**APPLICANT'S FIRST SET OF  
INTERROGATORIES TO OPPOSER**

Pursuant to Trademark Rule of Practice 2.120 and Federal Rules of Civil Procedure 26 and 33, Applicant Ate My Heart Inc., by its attorneys, Pryor Cashman LLP, hereby requests that Opposer, Christina Sukljian, answer the following interrogatories fully and under oath and produce the documents specified therein that are in her possession, custody or control for inspection and copying at the offices of Pryor Cashman LLP, 7 Times Square, New York, New York 10036, within thirty (30) days of the date of service hereof.

**DEFINITIONS**

A. The term "Opposer" refers to Christina Sukljian and any and all companies, employees, partners, affiliates, agents, assigns, representatives, attorneys or other persons or entities acting on her behalf or under her control, whether in the past or the present.

B. The term "Applicant" refers to Ate My Heart Inc. and any and all related entities, subsidiaries, parent companies, officers, employees, partners, affiliates, agents, assigns,

representatives, attorneys or other persons or entities acting on its behalf or under its control, whether in the past or the present.

C. The term "Opposer's Goods" refers to each of the items set forth in Opposer's Registration No. 2,898,544 for the mark GAGA PURE PLATINUM.

D. The term "Opposer's Mark" refers to the mark GAGA PURE PLATINUM as set forth in Opposer's Registration No. 2,898,544.

E. The term "Registration" refers to Opposer's Registration No. 2,898,544.

F. The term "Action" refers to the instant opposition proceeding brought by Opposer against Applicant's Application before the Trademark Trial and Appeal Board (Action No. 92055279).

G. The term "Applicant's Mark" refers to the mark HAUS OF GAGA.

H. The term "Application" refers to Applicant's Application Serial No. 85215017 for the mark HAUS OF GAGA.

I. The term "Identify" when used in reference to: (a) a natural person, means to provide that person's name, address, telephone number, place of employment and/or occupation, job title, and business address and telephone number; and (b) a corporation, means to list the state of incorporation, address, telephone number, and the names of all officers and directors with whom you have dealt in connection with the matters raised by the Complaint and Answer.

J. Unless specifically stated otherwise, the term "document" has the broadest meaning accorded to it and includes all written, typewritten, printed or recorded matter (however produced or reproduced or stored) of every kind and description in the actual or constructive possession, custody, care or control of any party or agent of the party called upon to produce documents pursuant to these requests, including, but not limited to, the following: notes; communications; electronic mail communications; e-mails, facsimile transmissions; memoranda; reports; letters; sound recordings; albums; compact discs; tapes (audio, video, computer and/or

other); bank statements and checks; agreements; contracts; transcripts or notes of conversations or meetings; minutes of meetings (with any attachments referenced therein); statements; resolutions; directives; reports; employment, payroll and/or salary records; deposition and trial transcripts; papers filed in court and/or arbitral forums; and legal instruments. The term “document” shall include both drafts and final versions, whether executed or not. Each copy of a document which contains any separate notations or writings thereon shall be deemed to be a separate document for purposes of these requests.

K. The term “concerning” means referring to, alluding to, relating to, connected with, supporting, commenting on, in respect of, about, regarding, discussing, showing, describing, mentioning, analyzing, reflecting and/or constituting.

L. The term “communication” means the transmittal of information in the form of facts, items, inquiries, opinions or otherwise.

M. The terms “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of each request all responses that might otherwise be construed to be outside its scope.

N. The term “all” shall include “each” and “any,” and the terms “each” and “any” shall include “all.”

O. Reference in the singular shall include the plural, and reference to the plural shall include the singular

### **INSTRUCTIONS**

1. In responding to these interrogatories, Opposer is required to furnish all information available to her and any of her representatives, employees, agents, investigators or attorneys and to obtain and furnish all information that is in her possession, custody or control or in the possession, custody or control of any of her representatives, employees, agents, investigators or attorneys. If Opposer’s response is that the requested information is not within her

possession or custody, please: (a) describe in detail the unsuccessful efforts Opposer made to obtain such information; and (b) identify who has control and the location of the information.

2. If any of these interrogatories cannot be answered in full, answer to the extent possible, specifying the reasons for the inability to answer the remainder and stating whatever information, knowledge or belief you have concerning the unanswered portion.

3. If any interrogatory is not fully answered on the grounds of a claim of privilege, support for the claim of privilege must be provided, including identification of the persons present each time the information responsive to the interrogatory was discussed, a description of the information sufficient to allow the claim of privilege to be evaluated, and the basis for the claimed privilege.

4. These interrogatories shall be deemed continuing, so as to require additional responses if further information responsive to these interrogatories is obtained after the time the responses are served. Such additional responses shall be served from time to time, but not later than twenty (20) days after such information is received.

5. Each objection to these interrogatories shall state with specificity the grounds for such objection, and the failure to specify the grounds for each objection within the time provided by the Federal Rules of Civil Procedure shall render the objection waived.

6. If any Document that would be responsive to a discovery request has been lost, discarded or destroyed, identify the Document as completely as possible, providing as much of the following information as possible: (a) the type of Document; (b) a description of the Document; (c) the approximate date it was lost, discarded or destroyed; (d) the circumstances and manner in which it was lost, discarded or destroyed; (e) the reason(s) for disposing of or discarding the Document; (f) the identity of the person who lost, discarded or destroyed the Document; (g) the identity of any person authorizing or having knowledge of the circumstances surrounding losing, discarding or destroying the Document; and (h) the identity of any person

having knowledge of its contents. In addition, identify any Document reflecting any of the information sought above.

7. If Opposer has no information about the subject of a particular interrogatory, or if for some reason Opposer is unable to answer the interrogatory, the response to that interrogatory should specifically so state, and no interrogatory should be without some response. If Opposer has some information now available that would be responsive, it should provide the information it now has and should specifically state when the balance of the information will be provided. The fact that a full answer cannot be given is not a basis for Opposer to fail to provide such information as is available at the time of the response to these interrogatories.

8. Pursuant to Federal Rule of Civil Procedure 33(d), in lieu of describing or identifying a document, Opposer may produce a copy of that document and identify the interrogatory to which it is furnished in response.

### **INTERROGATORIES**

1. Identify all customers of Opposer's Goods sold in connection with Opposer's Mark each year from 2001 to present broken out by year and Goods.

2. Identify persons having knowledge or information concerning any of the facts Opposer relied on in its Notice of Opposition, and describe, with respect to each such person: (a) the information that each such person possesses; and (b) his/her relationship to the parties to this action.

3. Specify the amount of (a) sales; (b) revenues; (c) profits; and (d) advertising and promotional expenditures for all of Opposer's Goods sold that bear Opposer's Mark that have been by Opposer in the United States each year from the first date alleged in the Registration to present broken out by year and Goods.

4. Describe in detail the actual use of Opposer's Mark on Opposer's Goods by identifying each type of item that bears Opposer's Mark and identifying the manner in which

Opposer's Mark is affixed to or used in connection with each such item.

5. Identify the date of first use in the United States of Opposer's Mark on each item identified in the Registration.

6. For each of Opposer's Goods bearing or offered in connection with Opposer's Mark in the United States, please state the following:

- (a) Opposer's channels of trade, including all former, current or prospective retail establishments, wholesale establishments and websites;
- (b) Opposer's targeted consumer group and/or targeted demographics;
- (c) The price points at which Opposer's Goods bearing Opposer's Mark are sold to consumers; and
- (d) The amount of money Opposer has earmarked or dedicated to the manufacture and, separately, the promotion of the Opposer's Goods bearing Opposer's Mark for 2012.

7. For each type of item identified in response to Interrogatory No. 4 above, state Opposer's annual volume of business in the United States by identifying the annual volume of sales in units and dollars from the date of first sale(s) to the date of Opposer's response.

8. Identify any and all persons Opposer has authorized, licensed or otherwise granted the right to use Opposer's Mark in commerce in connection with Opposer's Goods. For each person identified, identify the date of commencement and termination of each such authorization, license or grant, and identify any written license agreements or franchise agreements granting rights to use Opposer's Mark.

9. Identify all cease and desist demand letters and responses thereto, litigations, trademark actions or proceedings, ICANN proceedings and/or other challenges concerning Opposer's Mark in any way. When responding to this interrogatory, include: (a) the dates of such challenge; (b) the third-party mark involved; (c) the adversarial party; and (d) the outcome

of each challenge.

10. Identify all of Opposer's market competitors for Opposer's Goods and state why Opposer believes that each identified entity is a competitor.

11. Identify the total number of sales of Opposer's Goods bearing Opposer's Mark each year from 2001 to the present.

12. Identify the first date that Opposer's began selling Opposer's Goods on gagapureplatinum.com.

13. Identify the registration date of Opposer's Facebook account for GAGA PURE PLATINUM.

14. Identify and describe the relationship between Opposer and Gaga Pure Platinum on the one hand and Zela International on the other.

15. Identify each item sold by or on behalf of Opposer since 2001 that bears Opposer's Mark.

16. Identify all web designers and developers and persons affiliated with use and registration of the domain name gagapureplatinum.com.

17. Identify all distributors for Opposer's Mark sold under Opposer's Goods each year from 2001 to the present.

18. Identify all retailers and wholesalers for Opposer's Mark sold under Opposer's Goods each year from 2001 to the present.

19. If you believe that Applicant's Mark is confusingly similar to Opposer's Mark, set forth the basis for your belief.

20. Identify all persons who provided information or otherwise assisted in responding to these Interrogatories and specify the Interrogatories for which each such person provided information or other assistance.

21. Identify all documents or things that you relied on in responding to these



Interrogatories.

Dated: November 7, 2012

PRYOR CASHMAN LLP

By 

Brad D. Rose, Esq.

Lisa M. Buckley, Esq.

Nicole E. Kaplan, Esq.

Pryor Cashman LLP

7 Times Square

New York, NY 10036

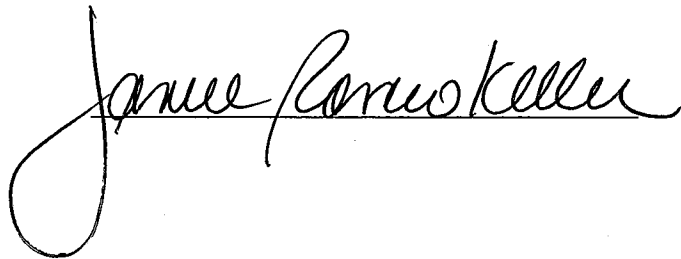
Attorneys for Applicant

CERTIFICATE OF SERVICE

I certify that on November 7, 2012, a true and correct copy of the foregoing APPLICANT'S FIRST SET OF INTERROGATORIES is being mailed to Opposer by Federal Express addressed to

Christina Sukljian  
13 Manor Street  
Albany, NY 12207

by depositing copies of same in postage prepaid, FEDERAL EXPRESS envelopes for delivery to the parties on the next business morning.

A handwritten signature in black ink, reading "James P. Conokeller". The signature is written in a cursive style with a large, looping initial "J".

# **EXHIBIT B**

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Application No. 85215017  
for the mark HAUS OF GAGA

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CHRISTINA SUKLJIAN,	:
	:
Opposer,	:
	:
v.	:
	:
ATE MY HEART, INC.,	:
	:
Applicant.	:

Opposition No. 91205046

**APPLICANT'S FIRST REQUEST FOR THE  
PRODUCTION OF DOCUMENTS**

Pursuant to Trademark Rule of Practice 2.120 and Federal Rules of Civil Procedure 26 and 34, Applicant Ate My Heart Inc., by its attorneys, Pryor Cashman LLP, hereby requests that Opposer Christina Sukljian produce the documents specified therein that are in her possession, custody or control for inspection and copying at the offices of Pryor Cashman LLP, 7 Times Square, New York, New York, within thirty (30) days of the date of service hereof.

**DEFINITIONS AND INSTRUCTIONS**

A. The term "Opposer" refers to Christina Sukljian and any and all companies, employees, partners, affiliates, agents, assigns, representatives, attorneys or other persons or entities acting on her behalf or under her control, whether in the past or the present.

B. The term "Applicant" refers to Ate My Heart Inc. and any and all related entities, subsidiaries, parent companies, officers, employees, partners, affiliates, agents, assigns, representatives, attorneys or other persons or entities acting on its behalf or under its control,

whether in the past or the present.

C. The term “Opposer’s Goods” refers to each of the items set forth in Opposer’s Registration No. 2,898,544 for the mark GAGA PURE PLATINUM.

D. The term “Opposer’s Mark” refers to the mark GAGA PURE PLATINUM as set forth in Opposer’s Registration No. 2,898,544.

E. The term “Registration” refers to Opposer’s Registration No. 2,898,544.

F. The term “Action” refers to the instant opposition proceeding brought by Opposer against Applicant’s Application before the Trademark Trial and Appeal Board (Action No. 91205046).

G. The term “Applicant’s Mark” refers to the mark HAUS OF GAGA.

H. The term “Application” refers to Applicant’s Application Serial No. 85215017 for the mark HAUS OF GAGA.

I. “Person” means both natural persons or any business, legal or governmental entity or association. The acts and knowledge of a person are defined to include the acts and knowledge of that person’s officers, agents, directors, employees, consultants, attorneys, representatives and any other person acting on its behalf.

J. “Communication” means the transmittal of information in the form of facts, ideas, inquiries or otherwise.

K. “Document” is defined to be synonymous in meaning and equal in scope to the usage of this term “documents or electronically stored information” in Fed. R. Civ. P. 34(a), including, without limitation, electronic or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term.

L. “Identify” with respect to persons means to give, to the extent known, the person’s full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment.

M. “Identify” with respect to documents means to give, to the extent known, the type

of document, general subject matter, date of document and author(s), addressee(s) and recipient(s).

N. "Concerning" means relating to, referring to, describing, evidencing or constituting.

O. The terms "any", "all" and "each" shall be construed as encompassing any and all.

P. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

Q. The use of the singular form of any word includes the plural and vice versa.

R. These requests shall be deemed to be continuing so as to require supplemental responses in accordance with Fed. R. Civ. P. 26(e).

S. Unless otherwise specified herewith, the time frame for each request is 2001 to present and the territory for each request in the United States.

T. If any Document that would be responsive to a discovery request has been lost, discarded or destroyed, identify the Document as completely as possible, providing as much of the following information as possible: (a) the type of Document; (b) a description of the Document; (c) the approximate date it was lost, discarded or destroyed; (d) the circumstances and manner in which it was lost, discarded or destroyed; (e) the reason(s) for disposing of or discarding the Document; (f) the identity of the person who lost, discarded or destroyed the Document; (g) the identity of any person authorizing or having knowledge of the circumstances surrounding losing, discarding or destroying the Document; and (h) the identity of any person having knowledge of its contents. In addition, identify any Document reflecting any of the information sought above.

U. If Opposer withholds any document, in whole or in part, on the basis of privilege, provide in sufficient detail information which will permit Applicant to evaluate the claim of privilege. If the privilege is being asserted in connection with a claim or defense governed by

state law, please indicate the state privilege rule being invoked.

### **DOCUMENT REQUESTS**

1. All documents sufficient to show the gross annual revenues received by Opposer from the sales of Opposer's Goods in the United States sold under Opposer's Mark each year since Opposer's first use of Opposer's Mark in 2001.

2. All documents sufficient to identify the quantity of each of the Opposer's Goods sold under Opposer's Mark for each year in the United States since Opposer's first use of Opposer's Mark in 2001.

3. All documents and things sufficient to show the use of Opposer's Mark in connection with each of Opposer's Goods each year since Opposer's date of first use in 2001.

4. All documents concerning packaging for Opposer's Goods bearing Opposer's Mark.

5. All documents concerning any logos, color schemes or other distinctive identifiers for Opposer's Goods.

6. All documents concerning use of Opposer's Mark in 2001 on (a) nail polish; (b) lipstick; (c) lip-gloss; (d) eye-liner; (e) lip-liner; (f) eye shadow; (g) face powder; (h) blush; (i) mascara sold under Opposer's Mark, including but not limited to purchase orders placed by Opposer, confirmations, manufacturing, shipping and customs records, orders for product from customers, Opposer's invoices, cancelled checks or other proof of payment and all internal accounting documents and records.

7. All documents concerning use of Opposer's Mark in 2002 on (a) nail polish; (b) lipstick; (c) lip-gloss; (d) eye-liner; (e) lip-liner; (f) eye shadow; (g) face powder; (h) blush; (i)

mascara sold under Opposer's Mark, including but not limited to purchase orders placed by Opposer, confirmations, manufacturing, shipping and customs records, orders for product from customers, Opposer's invoices, cancelled checks or other proof of payment and all internal accounting documents and records.

8. All documents concerning use of Opposer's Mark in 2003 on (a) nail polish; (b) lipstick; (c) lip-gloss; (d) eye-liner; (e) lip-liner; (f) eye shadow; (g) face powder; (h) blush; (i) mascara sold under Opposer's Mark, including but not limited to purchase orders placed by Opposer, confirmations, manufacturing, shipping and customs records, orders for product from customers, Opposer's invoices, cancelled checks or other proof of payment and all internal accounting documents and records.

9. All documents concerning use of Opposer's Mark in 2004 on (a) nail polish; (b) lipstick; (c) lip-gloss; (d) eye-liner; (e) lip-liner; (f) eye shadow; (g) face powder; (h) blush; (i) mascara sold under Opposer's Mark, including but not limited to purchase orders placed by Opposer, confirmations, manufacturing, shipping and customs records, orders for product from customers, Opposer's invoices, cancelled checks or other proof of payment and all internal accounting documents and records.

10. All documents concerning use of Opposer's Mark in 2005 on (a) nail polish; (b) lipstick; (c) lip-gloss; (d) eye-liner; (e) lip-liner; (f) eye shadow; (g) face powder; (h) blush; (i) mascara sold under Opposer's Mark, including but not limited to purchase orders placed by Opposer, confirmations, manufacturing, shipping and customs records, orders for product from customers, Opposer's invoices, cancelled checks or other proof of payment and all internal accounting documents and records.

11. All documents concerning use of Opposer's Mark in 2006 on (a) nail polish; (b)



lipstick; (c) lip-gloss; (d) eye-liner; (e) lip-liner; (f) eye shadow; (g) face powder; (h) blush; (i) mascara sold under Opposer's Mark, including but not limited to purchase orders placed by Opposer, confirmations, manufacturing, shipping and customs records, orders for product from customers, Opposer's invoices, cancelled checks or other proof of payment and all internal accounting documents and records.

12. All documents concerning use of Opposer's Mark in 2007 on (a) nail polish; (b) lipstick; (c) lip-gloss; (d) eye-liner; (e) lip-liner; (f) eye shadow; (g) face powder; (h) blush; (i) mascara sold under Opposer's Mark, including but not limited to purchase orders placed by Opposer, confirmations, manufacturing, shipping and customs records, orders for product from customers, Opposer's invoices, cancelled checks or other proof of payment and all internal accounting documents and records.

13. All documents concerning use of Opposer's Mark in 2008 on (a) nail polish; (b) lipstick; (c) lip-gloss; (d) eye-liner; (e) lip-liner; (f) eye shadow; (g) face powder; (h) blush; (i) mascara sold under Opposer's Mark, including but not limited to purchase orders placed by Opposer, confirmations, manufacturing, shipping and customs records, orders for product from customers, Opposer's invoices, cancelled checks or other proof of payment and all internal accounting documents and records.

14. All documents concerning use of Opposer's Mark in 2009 on (a) nail polish; (b) lipstick; (c) lip-gloss; (d) eye-liner; (e) lip-liner; (f) eye shadow; (g) face powder; (h) blush; (i) mascara sold under Opposer's Mark, including but not limited to purchase orders placed by Opposer, confirmations, manufacturing, shipping and customs records, orders for product from customers, Opposer's invoices, cancelled checks or other proof of payment and all internal accounting documents and records.

15. All documents concerning use of Opposer's Mark in 2010 on (a) nail polish; (b) lipstick; (c) lip-gloss; (d) eye-liner; (e) lip-liner; (f) eye shadow; (g) face powder; (h) blush; (i) mascara sold under Opposer's Mark, including but not limited to purchase orders placed by Opposer, confirmations, manufacturing, shipping and customs records, orders for product from customers, Opposer's invoices, cancelled checks or other proof of payment and all internal accounting documents and records.

16. All documents concerning use of Opposer's Mark in 2011 on (a) nail polish; (b) lipstick; (c) lip-gloss; (d) eye-liner; (e) lip-liner; (f) eye shadow; (g) face powder; (h) blush; (i) mascara sold under Opposer's Mark, including but not limited to purchase orders placed by Opposer, confirmations, manufacturing, shipping and customs records, orders for product from customers, Opposer's invoices, cancelled checks or other proof of payment and all internal accounting documents and records.

17. All documents concerning use of Opposer's Mark in 2012 on (a) nail polish; (b) lipstick; (c) lip-gloss; (d) eye-liner; (e) lip-liner; (f) eye shadow; (g) face powder; (h) blush; (i) mascara sold under Opposer's Mark, including but not limited to purchase orders placed by Opposer, confirmations, manufacturing, shipping and customs records, orders for product from customers, Opposer's invoices, cancelled checks or other proof of payment and all internal accounting documents and records.

18. All invoices and purchase orders showing sales of each of the goods bearing Opposer's Mark each year since 2001 broken down by year.

19. All shipping documents for each of Opposer's Goods bearing Opposer's Mark each year since 2001 broken down by year.

20. All documents sufficient to identify all former, current or prospective direct

customers of Opposer's Goods bearing Opposer's Mark from the first sale of said products, and all documents sent to or received from such direct customers.

21. All documents concerning the current inventory of Opposer's Goods in Opposer's possession bearing Opposer's Mark in units and dollars, separated by type of good (e.g., nail polish, lipstick, lip-gloss, eye-liner, lip-liner, eye shadow, face powder, blush, mascara, etc.).

22. All documents concerning Opposer's knowledge of the existence and/or activities of Applicant.

23. All documents sufficient to illustrate the date when the website associated with the domain name gagasureplatinum.com was launched.

24. All documents, including but not limited to all contracts, licenses, agreements, with web developers for the website associated with the domain name gagasureplatinum.com.

25. All documents concerning the design and layout of the website associated with the domain name gagasureplatinum.com.

26. All documents concerning the website gagasureplatinum.com.

27. All documents concerning the sale of products on zela.com.

28. All documents sufficient to show the relationship between Opposer and Zela International.

29. All documents concerning the sale of Opposer's Goods by Zela.com or Zela International.

30. All documents sufficient to show the registration date of the Facebook account for GAGA PURE PLATINUM.

31. All documents concerning any application Opposer filed with the USPTO in connection with Opposer's Mark.

32. All documents concerning Opposer's creation, selection or adoption of its Mark, including but not limited to any marketing studies, search reports, opinions, trademark or copyright registration searches, investigations or advice created for or rendered to Opposer.

33. All documents concerning Opposer's uses and/or intended uses for Opposer's Mark in the United States.

34. All documents concerning Opposer's first use of Opposer's Mark in commerce including the date of first sale.

35. Samples of each of Opposer's Goods sold or offered for sale under Opposer's Mark.

36. All documents sufficient to identify the target consumers for Opposer's Goods sold under Opposer's Mark, including but not limited to marketing studies, research reports, consumer correspondence, consumer surveys, opinions and investigations

37. All documents concerning the creation, selection, manufacture and/or development of any of Opposer's Goods made under Opposer's Mark.

38. All documents sufficient to identify the goods that are sold, will be sold or are in development to be sold under Opposer's Mark, whether or not currently in use in commerce.

39. All documents sufficient to identify any and all former, current or prospective retailers, wholesalers or other sellers and/or distributors and sellers of any of Opposer's Goods sold under Opposer's Mark.

40. All documents sufficient to identify the geographic regions of the United States in which any of Opposer's Goods sold under Opposer's Mark are currently offered for sale or will be offered for sale.

41. All documents sufficient to identify any and all domain names registered by or on

behalf of Opposer incorporating Opposer's Mark, including but not limited to applications, registrations, agreements, correspondence and e-mails.

42. Copies of all advertising and promotional materials including, but not limited to, pamphlets, promotional materials, labels, signage, business cards, letterhead or invoices, used in the United States or proposed to be used in the United States, in connection with the sale of Opposer's Goods bearing Opposer's Mark.

43. All documents concerning publicity for Opposer's Mark in the United States, including, but not limited to, press releases, brochures, flyers, advertisements and promotional literature, whether published in print, broadcast or electronic form.

44. All documents concerning publicity for Opposer's Goods in the United States, including but not limited to press releases, brochures, flyers, advertisements and promotional literatures, whether published in print, broadcast or electronic form.

45. All documents concerning promotional events in the United States sponsored by Opposer involving Opposer's Mark, including but not limited to press and/or launch parties, promotions and social events.

46. All documents concerning consumer recognition of Opposer's Mark in the United States.

47. All documents concerning Opposer's business, marketing, and advertising plans and strategies for Opposer's Goods sold under Opposer's Mark, including, but not limited to, and plans to advertise Opposer's Goods sold under Opposer's Mark on television stations, radio stations, Internet web sites, cable television stations, national television networks, newspapers, magazines, circulars or other media outlets.

48. All documents sufficient to identify Opposer's annual expenses in the United

States for its business, marketing, advertising and promotional plans, publicity and strategies concerning Opposer's Mark from the date of inception to the present.

49. All documents concerning communications with any outside consultants concerning Opposer's Mark including but not limited to correspondence to or from publicity firms, public relations agents, advertising agencies, sales agencies, marketing firms and other consulting firms.

50. Representative samples of each piece of advertising or promotional material or proposed advertising or promotional material showing use of Opposer's Mark in connection with Opposer's Goods, including a page (if applicable) that identifies the medium and date of publication of such advertisement or promotion.

51. All documents concerning unsolicited media attention in the United States received by Opposer in connection with Opposer's Mark, including, but not limited to, magazine and newspaper articles, broadcast media and electronic publications in the past year.

52. All documents showing, discussing, concerning and/or comparing Opposer's Goods to the goods of any competitor or any other person or entity offering goods comparable to Opposer's Goods.

53. All documents concerning the intended purchaser(s) of Opposer's Goods, bearing Opposer's Mark.

54. All documents concerning the licensing or assignment of any trademark, copyright, domain name or contractual rights in Opposer's Mark or prospective licensing or assignment of any trademark, copyright or contractual rights for Opposer's Mark to any third party.

55. All documents reflecting past, present and potential agents, licensees, joint

venture partners, sponsors or promoters, hired by or on behalf of Opposer in connection with Opposer's Goods offered under Opposer's Mark.

56. All documents, including, but not limited to, any studies, reports, analysis, and/or communications prepared by or for Opposer, concerning Opposer's Goods.

57. All documents concerning any goods in International Class 3 that are offered for sale or sold by any third party and which use the term GAGA or any term substantially similar thereto including, but not limited to, in the name of the product and/or packaging of the product.

58. All documents concerning Opposer's efforts to enforce Opposer's Mark.

59. All documents concerning any allegations of infringement of Opposer's Mark or lawsuits filed which allege infringement of Opposer's Mark, against any individual or entity.

60. All documents concerning Opposer's claims in its Notice of Opposition in this Action.

61. All documents concerning any coexistence agreements concerning Opposer's Mark to which Opposer is a party.

62. All documents reviewed and/or relied upon in drafting the Notice of Opposition in this Action.

63. All documents sufficient to identify all persons with knowledge or information concerning the subject matter of this Action.

64. All documents sufficient to show Opposer's revenue of sale of each of Opposer's Goods in Class 3 in the United States each year from the date of first use.

65. All documents concerning registration of the domain name gagapureplatinum.com.

66. All documents concerning any press releases concerning this Action or concerning

the dispute between Applicant and Opposer in general.

67. All documents concerning the decision to issue a press release concerning this Action or concerning the dispute between Applicant and Opposer in general.

68. All documents sufficient to show use in the United States of Opposer's Mark on each item listed in Opposer's Registration, including invoices and the identifies of each and every purchase of Opposer's Goods.

69. All documents that Opposer intends to rely on during the testimony and trial periods in the Action.

70. For each expert witness Opposer intends to call, a copy of such witness's resume, all documents concerning communications between such witness and Applicant, all documents evidencing any opinion formed by such witness, and all documents relied upon by such witness in forming an opinion as to the substance of such witness' testimony.

Dated: New York, New York  
November 7, 2012

PRYOR CASHMAN LLP

By: 

Brad D. Rose, Esq.

Lisa M. Buckley, Esq.

Nicole E. Kaplan, Esq.

Attorneys for Applicant

7 Times Square

New York, New York 10036-6569

(212) 421-4100

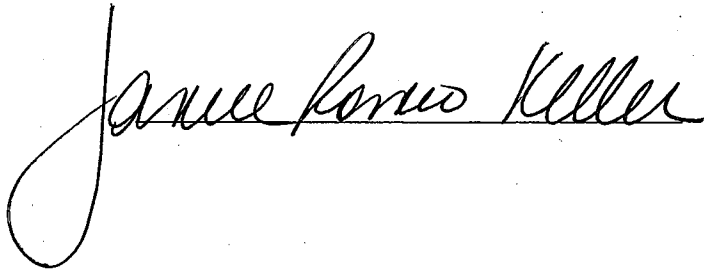


CERTIFICATE OF SERVICE

I certify that on November 7, 2012, a true and correct copy of the foregoing APPLICANT'S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS is being mailed to Opposer by Federal Express addressed to

Christina Sukljian  
13 Manor Street  
Albany, NY 12207

by depositing copies of same in postage prepaid, FEDERAL EXPRESS envelopes for delivery to the parties on the next business morning.

A handwritten signature in black ink, reading "James Patrick Keller". The signature is written in a cursive style with a large, looping initial "J".

# **EXHIBIT C**

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Application No. 85215017  
Mark: HAUS OF GAGA

-----X	:	
Christina Sukljian,	:	
	:	
Plaintiff	:	
	:	
v.	:	Opposition No. 91205046
	:	
Ate My Heart, Inc.,	:	
	:	
Defendant	:	
-----X		

**PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST REQUEST FOR THE PRODUCTION OF  
DOCUMENTS**

Plaintiff, Christina Sukljian, hereby answers Defendant, Ate My Heart, Inc.'s, first request for the production of documents.

**GENERAL OBJECTIONS**

Plaintiff objects to the instructions and definitions contained in Defendant Ate My Heart, Inc.'s, First Request for the Production of Documents because, as applied to specific discovery requests, they cause the requests to be overly broad and global, vague and ambiguous, unduly burdensome, and to seek information, in part, protected from disclosure by the attorney-client, work product, party communications, investigative, and consulting expert privileges. Subject to and without waiving these general objections, Plaintiff responds to the specific interrogatories as follows:

**ANSWERS**

Response to Document Request No. 1: Claim of privilege by Plaintiff.

Response to Document Request No. 2: Claim of privilege by Plaintiff.

Response to Document Request No. 3: Claim of privilege by Plaintiff.

Response to Document Request No. 4: Claim of privilege by Plaintiff

Response to Document Request No. 5: Claim of privilege by Plaintiff

Response to Document Request No. 6: Claim of privilege by Plaintiff

Response to Document Request No. 7: Claim of privilege by Plaintiff

Response to Document Request No. 8: Claim of privilege by Plaintiff

Response to Document Request No. 9: Claim of privilege by Plaintiff

Response to Document Request No.10: Claim of privilege by Plaintiff

Response to Document Request No.11: Claim of privilege by Plaintiff

Response to Document Request No.12: Claim of privilege by Plaintiff

Response to Document Request No.13: Claim of privilege by Plaintiff

Response to Document Request No.14: Claim of privilege by Plaintiff

Response to Document Request No.15: Claim of privilege by Plaintiff

Response to Document Request No.16: Claim of privilege by Plaintiff

Response to Document Request No.17: Claim of privilege by Plaintiff

Response to Document Request No.18: Claim of privilege by Plaintiff

Response to Document Request No.19: Claim of privilege by Plaintiff

Response to Document Request No.20: Claim of privilege by Plaintiff

Response to Document Request No.21: Claim of privilege by Plaintiff

Response to Document Request No.22: Claim of privilege by Plaintiff

Response to Document Request No.23: Claim of privilege by Plaintiff

Response to Document Request No.24: Claim of privilege by Plaintiff

Response to Document Request No.25: Claim of privilege by Plaintiff

Response to Document Request No.26: Claim of privilege by Plaintiff

Response to Document Request No.27: Claim of privilege by Plaintiff

Response to Document Request No.28: Claim of privilege by Plaintiff

Response to Document Request No.29: Claim of privilege by Plaintiff

Response to Document Request No.30: Claim of privilege by Plaintiff

Response to Document Request No.31: Claim of privilege by Plaintiff

Response to Document Request No.32: Claim of privilege by Plaintiff

Response to Document Request No.33: Claim of privilege by Plaintiff

Response to Document Request No.34: Claim of privilege by Plaintiff

Response to Document Request No.35: Samples of Plaintiff's goods are in use in commerce and available to purchase on [www.gagapureplatinum.com](http://www.gagapureplatinum.com).

Response to Document Request No.36: Claim of privilege by Plaintiff

Response to Document Request No.37: Claim of privilege by Plaintiff

Response to Document Request No.38: Claim of privilege by Plaintiff

Response to Document Request No.39: Claim of privilege by Plaintiff

Response to Document Request No.40: Claim of privilege by Plaintiff

Response to Document Request No.41: Claim of privilege by Plaintiff

Response to Document Request No.42: Claim of privilege by Plaintiff

Response to Document Request No.43: Claim of privilege by Plaintiff

Response to Document Request No.44: Claim of privilege by Plaintiff

Response to Document Request No.45: Claim of privilege by Plaintiff

Response to Document Request No.46: Claim of privilege by Plaintiff

Response to Document Request No.47: Claim of privilege by Plaintiff

Response to Document Request No.48: Claim of privilege by Plaintiff

Response to Document Request No.49: Claim of privilege by Plaintiff

Response to Document Request No.50: Claim of privilege by Plaintiff

Response to Document Request No.51: Claim of privilege by Plaintiff

Response to Document Request No.52: Claim of privilege by Plaintiff

Response to Document Request No.53: Claim of privilege by Plaintiff

Response to Document Request No.54: Claim of privilege by Plaintiff

Response to Document Request No.55: Claim of privilege by Plaintiff

Response to Document Request No.56: Claim of privilege by Plaintiff

Response to Document Request No.57: Claim of privilege by Plaintiff

Response to Document Request No.58: Claim of privilege by Plaintiff

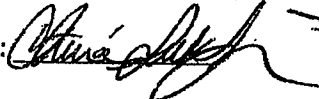
Response to Document Request No.59: Claim of privilege by Plaintiff

Response to Document Request No.60: Claim of privilege by Plaintiff

Response to Document Request No.61: Claim of privilege by Plaintiff  
Response to Document Request No.62: Claim of privilege by Plaintiff  
Response to Document Request No.63: Claim of privilege by Plaintiff  
Response to Document Request No.64: Claim of privilege by Plaintiff  
Response to Document Request No.65: Claim of privilege by Plaintiff  
Response to Document Request No.66: Claim of privilege by Plaintiff  
Response to Document Request No.67: Claim of privilege by Plaintiff  
Response to Document Request No.68: Claim of privilege by Plaintiff  
Response to Document Request No.69: Claim of privilege by Plaintiff  
Response to Document Request No.70: Claim of privilege by Plaintiff

Dated: Albany, New York  
December 6, 2012

Respectfully Submitted,

By: 

Christina Sukljian  
Plaintiff  
GAGA PURE PLATINUM  
13 Manor Street  
Albany, New York 12207

**CERTIFICATE OF PROOF OF SERVICE**

I hereby certify that a true and correct copy of the foregoing PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS has been served on Ate My Heart, Inc. by mailing said copy on December 6, 2012 via The United States Postal Service Priority Mail with Signature Confirmation in a postage prepaid envelope addressed to: Ate My Heart, Inc. c/o Pryor Cashman LLP, 7 Times Square, New York, NY 10036.



Christina Sukljan

13 Manor Street

Albany, NY 12207

Date of Deposit: December 6, 2012  
USPS Priority Mail



**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Application No. 85215017  
Mark: HAUS OF GAGA

-----X	:	
Christina Sukljian,	:	
	:	
Plaintiff	:	
	:	
v.	:	Opposition No. 91205046
	:	
Ate My Heart, Inc.,	:	
	:	
Defendant	:	
-----X	:	

**PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST SET OF INTERROGATORIES**

Plaintiff, Christina Sukljian, hereby answers Defendant, Ate My Heart, Inc.'s, first set of interrogatories.

**GENERAL OBJECTIONS**

Plaintiff objects to the instructions and definitions contained in Defendant Ate My Heart, Inc.'s, First Set of Interrogatories because, as applied to specific discovery requests, they cause the requests to be overly broad and global, vague and ambiguous, unduly burdensome, and to seek information, in part, protected from disclosure by the attorney-client, work product, party communications, investigative, and consulting expert privileges. Subject to and without waiving these general objections, Plaintiff responds to the specific interrogatories as follows:

**ANSWERS**

Response to Interrogatory No. 1: Claim of privilege by Plaintiff.

Response to Interrogatory No. 2: Christina Sukljian

Response to Interrogatory No. 3: Claim of privilege by Plaintiff.

Response to Interrogatory No. 4: Claim of privilege by Plaintiff

Response to Interrogatory No. 5: Claim of privilege by Plaintiff

Response to Interrogatory No. 6: Claim of privilege by Plaintiff

Response to Interrogatory No. 7: Claim of privilege by Plaintiff

Response to Interrogatory No. 8: Claim of privilege by Plaintiff

Response to Interrogatory No. 9: Claim of privilege by Plaintiff

Response to Interrogatory No.10: Claim of privilege by Plaintiff

Response to Interrogatory No.11: Claim of privilege by Plaintiff

Response to Interrogatory No.12: Claim of privilege by Plaintiff

Response to Interrogatory No.13: Claim of privilege by Plaintiff

Response to Interrogatory No.14: Claim of privilege by Plaintiff

Response to Interrogatory No.15: Claim of privilege by Plaintiff

Response to Interrogatory No.16: Claim of privilege by Plaintiff

Response to Interrogatory No.17: Claim of privilege by Plaintiff

Response to Interrogatory No.18: Claim of privilege by Plaintiff

Response to Interrogatory No.19: Claim of privilege by Plaintiff

Response to Interrogatory No.20: Christina Sukljian

Response to Interrogatory No.21: Claim of privilege by Plaintiff

Dated: Albany, New York  
December 6, 2012

Respectfully Submitted,

By: 

Christina Sukljan  
Plaintiff  
GAGA PURE PLATINUM  
13 Manor Street  
Albany, New York 12207

**CERTIFICATE OF PROOF OF SERVICE**

I hereby certify that a true and correct copy of the foregoing PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST SET OF INTERROGATORIES has been served on Ate My Heart, Inc. by mailing said copy on December 6, 2012 via The United States Postal Service Priority Mail with Signature Confirmation in a postage prepaid envelope addressed to: Ate My Heart, Inc. c/o Pryor Cashman LLP, 7 Times Square, New York, NY 10036.

A handwritten signature in black ink, appearing to read "Christina Sukljan", written over a horizontal line.

Christina Sukljan

13 Manor Street

Albany, NY 12207

Date of Deposit: December 6, 2012  
USPS Priority Mail